

Public Utility Law Project of New York, Inc.

PIETER SCHUYLER FINANCIAL CENTER

39 COLUMBIA STREET
TELEPHONE 1518) 449-3375

ALBANY, NY 12207-2717 FAX (518) 449-1769

JUL 1 8 1994

FOO WALL ROOM

July 15, 1994

RECEIVED

Office of the Secretary Federal Communications Commission 1919 M Street, NW Washington, D.C. 20554 FUL 1 8 1994

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF SECRETARY

Re: Billed Party

Preference for 0+
InterLATA Calls
FCC Docket No. 92-77

Dear Sir/Madam:

Enclosed please find the original and nine copies of the comments of the Public Utility Law Project of New York, Inc. in the above captioned proceeding.

Sincerely,

Trudi Rénwick, Ph.D. Economic Policy Analyst

TRUCK / Renural

No. of Copies rec'd 74 List A B C D E

ORIGINAL

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

Louis Level Line I New Town

.iil 1 8 1994

RECEIVED

JUL 1 8 1994

FUL WITH HOOM

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF SECRETARY

In the Matter Of X
BILLED PARTY PREFERENCE X
FOR 0+ INTERLATA CALLS X
X

CC Docket No.92-77

COMMENTS OF THE PUBLIC UTILITY LAW PROJECT OF NEW YORK INC.

PUBLIC UTILITY LAW PROJECT OF NEW YORK, INC.

B. Robert Piller, Esq. Executive Director

By: Trudi J. Renwick, Ph.D.
Economic Policy Analyst
Public Utility Law Project of
New York, Inc.
Pieter Schuyler Financial Center
39 Columbia Street
Albany, New York 12207-2717
(518) 449-3375

Date: July 15, 1994

SUMMARY

The Public Utility Law Project of New York (PULP) is a public interest law firm representing the interests of low-income utility and energy consumers. PULP respectfully submits these comments on the specific issue of whether customers receiving calls from correctional institutions should have the benefit of Billed Party Preference (BPP).

For the families of prisoners in New York State, the current system of collect-only calls represents a pure monopoly. Prisoners held in state facilities wishing to make telephone contact with their families must use the single authorized provider to place these calls. The person who accepts these calls must accept all the rates and conditions established by this single provider.

PULP urges the FCC to include calls from inmates in the BPP system. In New York, families of inmates, many of which are low-income and include minors, are paying higher than competitive rates for these telephone services. Consumer-oriented competition in this market can be expected to bring down rates and stimulate the providers of these services to halt abuses and improve service quality. BPP for inmate-only calls will not necessarily increase fraud and abuse of the phone system. Inmate calls should not be excluded out of concern for the impact of lost commission revenues on prison budgets. Worthwhile prison programs should be funded from general tax revenues, not from a special tax on innocent relatives.

TABLE OF CONTENTS

SUMMARY OF COMMENTS	
INTRODUCTION	
	CALLS FROM INMATES OFTEN CONSTITUTE A EN FOR THE FAMILIES OF PRISONERS 4
	T-ONLY CALLS FROM CORRECTIONAL FACILITIES DO RICE-DISCIPLINE IMPOSED BY THE MARKETPLACE 7
·	R CALLS IS NOT SUFFICIENT PROTECTION FOR THE MATES AND CANNOT SUBSTITUTE OR SERVICE QUALITY
	OOES NOT ENCOURAGE COMPETITION DIRECTED TOWARD
	C INTEREST IS SERVED BY THE EXCLUSION FROM BPI VED FROM PRISONERS
CONCLUSION	
EXHIBITS	
Exhibit 1:	Correspondence from Prisoners' Legal Services
Exhibit 2:	Advertisements of providers of inmate-phone services
Exhibit 3:	Letter from New York State Department of Corrections regarding Family Benefit Fund allocations

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

		X				
In the	Matter Of	X				
		Х				
BILLED	PARTY PREFERENCE	X	CC	Docket	No.	92-77
FOR 0+	INTERLATA CALLS	X				
		X				
		X				

COMMENTS OF THE PUBLIC UTILITY LAW PROJECT OF NEW YORK INC.

INTRODUCTION

The Public Utility Law Project of New York (PULP), a public interest law firm representing the interests of low-income utility and energy consumers, submits comments in response to the Further Notice of Proposed Rulemaking (FNPR) issued May 19, 1994. The FNPR solicits further comments on the implementation of a "billed party preference" (BPP) system for 0+interLATA payphone traffic and for other types of operator-assisted interLATA traffic. BPP allows customers receiving interLATA collect calls to have them routed by their selected carrier.

In the FNPR the Commission restates its preliminary conclusion that the introduction of a BPP system will serve the public interest. The Commission found that BPP would stimulate competition in operator services and that this competition should

¹ Consideration of this system began in May 1992. <u>See</u>
Billed Party Preference for 0+ InterLATA Calls, Notice of
Proposed Rulemaking, CC Docket No. 92-77, 7 FCC Rcd 3027 (1992).

"result in lower prices and better services." Among other issues, the FNPR requests specific comments on the breadth of coverage of BPP and specifically whether calls received from inmates of correctional institutions should be excluded from BPP.

PULP provides legal representation and technical assistance to low-income utility and energy consumers, and to not-for-profit agencies and organizations whose objectives include services to or advocacy on behalf of poor consumers. PULP routinely represents the special needs of low-income New Yorkers before the New York State Public Service Commission in utility rate cases and in generic proceedings where utility policies are set, before state and local Departments of Social Services where utility and energy assistance programs are designed and administered, and in courts where issues involving utility and energy rights and benefits are litigated.

PULP intervenes at the federal level before legislative, administrative or regulatory bodies when federal policy will significantly impact the low-income residents of New York. Since many of the families of inmates accepting collect calls from correctional institutions are low-income, PULP respectfully submits these comments on the specific issue of whether calls received from inmates of correctional institutions should be excluded from BPP.

In New York State, the more than 65,000 prisoners held in state-administered correctional facilities communicate with

² FNPR at 2.

family and friends through the Inmate Call Home Program operated by the New York State Department of Correctional Services (DOCS). Since its inception in 1985 the program has mushroomed from 50 coinless phones at a single facility to a statewide system with over 2,300 phones.³ There are at least another 3,000 inmate-only phones in county and city correctional facilities in New York State.⁴

For the families of prisoners in New York State, the current system of collect-only calls represents a pure monopoly. Prisoners held in state facilities wishing to make telephone contact with their families must use VAC, the single authorized provider to place these calls. The person who accepts these calls must accept the rates and conditions established by this single provider. Unlike other pay telephones, inmate-phones usually block access code dialing and therefore neither the inmate nor the family has any ability to select a carrier.⁵

³ Value-Added Communications Inc. (VAC) has served as the exclusive provider of the state program since 1995. The contract with the Department of Corrections notes that VAC "submitted the most qualified bid and offered the highest paid commission rate." (Emphasis added.)

See the March 8, 1994 Comments of The NYNEX Telephone Companies In the Matter of The Petition of the Inmate Calling Services Providers for Declaratory Ruling, RM-8181. NYNEX estimated that the inmate-only phones of the New York State Department of Corrections represent 39 percent of the inmate-only phones in service in the New York Telephone service territory.

⁵ Correctional facilities were specifically exempted from the Commission's rules that prohibit the blocking of access code dialing at call aggregator locations. <u>Policies and Rules</u> <u>Concerning Operator Services Providers</u>, 6 FCC Rcd 2744, 2752 (1991).

Also, unlike most other pay phones, it is not possible for the family to call in to the prison to call back the inmate using the family's carrier after receiving a brief collect call.

Families of prisoners should be given the opportunity to share the potential benefits of a BPP system. Like other consumers, families of inmates can expect BPP to result in lower rates and better service. Since many of the recipients of the collect calls from prisoners are indigent, there is a compelling public interest served by the inclusion of these calls in a BPP system.

CHARGES FOR COLLECT CALLS FROM INMATES OFTEN CONSTITUTE A FINANCIAL BURDEN FOR THE FAMILIES OF PRISONERS

Increasingly inmate phones provide the vital link between inmates and their families. With illiteracy rates estimated at about 40 percent of the inmate population and prisons located in distant communities, the telephone is often the only regular means of communication between a family and an inmate.⁶ Although only one fifth of all inmates are married, 57 percent of inmates are parents of one or more minor children.⁷ According to some estimates, the number of children with an imprisoned parent grew from 21,000 in 1978 to one million in 1990. Some predict that by

⁶ "Who Goes to Prison," <u>Americans Behind Bars</u>, Edna Clark Foundation, 1993.

U.S. Department of Justice, Bureau of Justice Statistics, Survey of State Prison Inmates, 1991, March 1993, NCJ-136949, p. 10.

the year 2000, prisons will be home to more than two million parents.⁸

A Department of Justice special report on women in prison reports that two-thirds of the women in State prisons had at least one child younger than 18; altogether, they were mothers to more than 56,000 minor children. An estimated 46 percent of the women with minor children said they talked with those children on the phone at least once a week. Since entering prison, three-quarters of the women interviewed had talked with their children on the phone. Sixteen percent of female inmates with minor children made daily telephone calls to their children.

If prisons were located in the communities from which most inmates originate, long distance collect calls would be less important to the maintenance of family ties. In New York State, however, prisoners are seldom detained in their own communities. According the New York State Department of Corrections, almost seventy percent of state inmates are from New York City but less than eight percent are held in the City. The other 92 percent of the inmates are housed in 68 facilities, many of which are located a considerable distance from New York City. The Attica facility, for example, is 410 miles from New York City. The

⁸ Daphne Muse, "Parenting in Prison," <u>Mothering</u>, Fall 1994, p. 99. Estimates of the number of children are based on data gathered by the Center for Children of Incarcerated Parents at Pacific Oaks College in Pasadena, California.

⁹ U.S. Department of Justice, Bureau of Justice Statistics Special Report, <u>Women in Prison</u>, March 1994, NCJ-145321, pp. 6-7.

families of these inmates have very limited opportunities for visitation and pay the highest rates for collect calls. 10

A pamphlet providing advice to those working with children of incarcerated parents in New York summarized the situation as follows:

Since all calls must be placed "collect" with the charges borne by the family, these calls can be expensive. The distance is often great between prisons and the communities in which the families live, resulting in substantial phone bills for the family which can be a financial hardship.¹¹

MANY INMATES AND THEIR FAMILIES ARE ECONOMICALLY DISADVANTAGED

The 1991 Department of Justice Survey of State Prison

Inmates found that more than half of all state prison inmates
reported an annual income of less than \$10,000 prior to their
arrest. Approximately 48 percent of all inmates and 61 percent
of female inmates had incomes below the federal poverty
guidelines in the month prior to incarceration. Only 55
percent of the inmates were employed full time during the month
in which they were arrested for their current offense. Before

Rates for long distance calls vary by distance with higher rates charged for calls over a greater distance.

The Osborne Association, <u>How Can I Help? Sustaining and Enhancing Family Ties for Children of Incarcerated Parents</u>." p. 13.

¹² Survey of State Prison Inmates, 1991, p. 3.

¹³ Special analysis of the Survey of Inmates of State Correctional Facilities conducted by Dr. Caroline Wolf-Harlow of the U.S. Department of Justice, U.S. Bureau of Justice Statistics. This analysis is consistent with an earlier estimate that the "average inmate was at the poverty level before entering jail" published in U.S. Department of Justice, Bureau of Justice Statistics, Report to the Nation on Crime and Justice, Second Edition, March 1988, NCJ-105506, March 1988, p. 49.

their admission to prison, an estimated 38% were receiving support from Social Security, welfare or charity.

Many of the families of these inmates are also low-income. The 1991 Department of Justice survey found that 70 percent of the female inmates and half the male inmates lived with their children prior to incarceration. If more than fifty percent of these families had incomes below the poverty line in the year prior to incarceration, most of these children remain economically disadvantaged after the parent is incarcerated. This data, while less comprehensive and detailed than a researcher would like, is sufficient to confirm the expectation that the families of inmates are predominately economically needy.

PROVIDERS OF COLLECT-ONLY CALLS FROM CORRECTIONAL FACILITIES DO NOT FACE THE PRICE-DISCIPLINE IMPOSED BY THE MARKETPLACE

The families of inmates pay high rates when they accept collect calls from the State correctional system. Not only do they pay the premium rates (compared to direct dial calls) charged for collect calls by all carriers, but the rates they pay are higher than the rates charged by most carriers for collect calls.

For example, a family in Brooklyn accepting a fifteen minute collect call from a prisoner at Great Meadows Correctional Facility in upstate New York would be charged \$4.85 --- 47 percent more than the direct dial weekday rate of \$3.29. The

Survey of State Prison Inmates at 10.

cost of the call from the prison includes a surcharge despite the fact that the system used in the state correctional facilities is completely automated. The rates paid exceed by almost eight percent the AT&T collect call rate of \$4.50.15

One of the principal benefits expected from the implementation of the BPP system is intensified price competition among long distance carriers for collect call services. He while there may be little public sympathy for prisoners, the families of prisoners are not criminals and often suffer economically. Absent a competing compelling public interest, there is not any justification to exclude these consumers from the anticipated fall in rates when BPP is implemented.

A CAP ON CHARGES FOR CALLS IS NOT SUFFICIENT PROTECTION FOR THE FAMILIES OF INMATES AND CANNOT SUBSTITUTE FOR SERVICE QUALITY COMPETITION

The suggestion has been made that prisons be exempted from BPP if they subscribe to an OSP that charges rates below that of the dominant carrier for inter and intraLATA calls. 17 While price competition and lower rates are the principal benefits expected from the transition to Billed Party Preference, giving consumers the ability to choose carriers should also enhance

These rate comparisons hold true even if one assumes a call of 30 minutes --- the maximum length permitted by the system. For a 30 minute call the relevant charges are \$6.44, \$8.00 and \$7.35 for a direct dial call, an inmate call carried by VAC and an AT&T collect call respectively. Rate estimates based on July 1994 telephone conversations with VAC and AT&T.

¹⁶ See FNPR at 6-7.

 $^{^{17}}$ See FNPR at 25.

service quality. Providers of ordinary long distance services who mistreat customers or offer substandard service risk the loss of these customers to competitors.

A monopoly provider of collect-only services faces no such risk. 18 The families of inmates must either meet the terms set by the provider or forego telephone communication with the incarcerated family member. Consequently, the provider is able to continue practices that would be untenable in the face of competition. 19 With Billed Party Preference customers not satisfied with their treatment by their chosen long distance carrier could take their business to a competing carrier.

¹⁸ Basic residential telephone service is also supplied by a single provider but these providers are subject to tight regulation. For example, in New York there are strict restrictions on service suspensions and terminations, deposit requirements and complaint handling. On the other hand, recognizing that competitive options exist for long distance services, long distance providers are subject to much lighter regulation. Despite their monopolistic market position, the OSPs providing collect-only service from the correctional facilities are also lightly regulated.

¹⁹ PULP has learned of numerous complaints regarding the treatment of families of inmates by the monopoly provider of phone services for state facilities. The provider routinely blocks calls to a specific number without any formal notification to the blocked party. For example, a six month block was placed on the phone of an inmate's terminally ill relative because of her two day delay in paying a phone bill. In a similar vein, the provider often collects an advance payment equivalent to one month of estimated collect calling service and customers who routinely accept auto-collect calls from inmates may be voluntarily or involuntarily "capped" at the advance payment level. See Exhibit 1 which contains copies of the correspondence from Prisoners' Legal Services.

THE CURRENT SYSTEM DOES NOT ENCOURAGE COMPETITION DIRECTED TOWARD CONSUMERS

The FNPR notes that one of the three principal benefits of Billed Party Preference would be that it would lead OSPs to "refocus their competitive energies on serving end users rather than paying commissions for the 0+ traffic from public phones."20 This is particularly important for the market segment represented by inmate-only phone services. Excerpts from advertisements directed toward prison administrators illustrate how few competitive energies are currently focused on end users. One publication introduces the subject of inmate telephone systems in the context of increasing inmate populations and inadequate funding:

... new alternative revenue sources are being sought and this can be answered by inmate phone system commission plans.²¹

A glossy AT&T promotional brochure boasts:

COMMISSIONS.

ONE MORE WAY TO OFFSET THE COST OF CORRECTIONS.

Every year, the taxpayers' cost of housing prisoners skyrockets. To help alleviate that burden AT&T Inmate Calling Services offers commissions on every AT&T call made at contracted facilities. Over time, those commissions could be surprisingly substantial.

The same promotional package quotes David Gutierrez, Assistant Jail Administrator, Lubbock County, Texas as a satisfied customer:

²⁰ FNPR at 6.

Robert E. Cefail, <u>Everything You Need To Know About Inmate Phones</u>, Robert Cefail & Associates, 1993, p. 10.

in just eight months with AT&T service, our commission revenues have more than doubled.

There is no mention in this promotional package of the rates charged to inmate families for these calls.²²

The June 1993 issue of "American Jails" contains six full page advertisements for jail phone systems for companies including RC&A (Robert Cefail and Associates), Ameritech, BELLSOUTH, USWEST and MCI. Copies of these ads can be found in Exhibit 2. Not one word in any of these ads refers to the rates charged inmate families for calls.

NO COMPELLING PUBLIC INTEREST IS SERVED BY THE EXCLUSION FROM BPP OF CALLS RECEIVED FROM PRISONERS

The FNPR notes that dozens of prisons and sheriff's offices and the OSPs serving them argue that BPP should not apply to calls from correctional institutions asserting that BPP would impede the ability of correctional facilities to prevent fraud, harassing phone calls, or other criminal or abusive use of prison phones.²³ In contrast, MCI argues that BPP significantly enhances fraud prevention and detection over today's industry experience.²⁴

Promotional materials from RC & A Communications are even further removed from telecommunications concerns of end users. RC & A offers correctional officers free Criminon courses/modules for inmates including "The Way to Happiness Course," based on The Way to Happiness, written by L. Ron Hubbard. See Exhibit 2 which contains a copy of this brochure.

FNPR at 22.

²⁴ See MCI Reply Comments at 14.

There are numerous mechanisms by which correctional institutions can continue to prevent telephone fraud and abuse after the implementation of BPP. In New York State the Department of Corrections allows inmates to place calls to only those numbers contained on a small preapproved list and these limits are imposed using customer premises equipment which is not inconsistent with BPP.

Representatives of prisons also argue that BPP would eliminate their commission revenues and that without 0+ commission revenues they could be forced to limit calling. These proponents of the prison call exclusion ignore the existence of alternative inmate telephone systems, most notably the federal debit card system. Currently the New York City correctional facility at Rikers Island uses an automated debit system which can eliminate burdensome collect call charges to families while maintaining commission revenues.²⁵

Finally, proponents of the exclusion mention the growing importance of inmate-phone commissions for the budgets of state and local correctional facilities. They are correct that commission revenues are large and growing. Telephone commission revenues to the Department of Corrections from the New York state system were \$11 million dollars in the year ended March 1993 and

[&]quot;Dropping Dimes with Aid of Lasers: On Rikers Island, New Technology for Calls to the Outside." New York Times, September 29, 1993, p. B1.

estimated to reach \$21 million in the year ended March 1994.²⁶
These funds flow through the Family Benefit Fund and are used to pay for medical care, infection control, family busing programs, postage, nurseries, the family violence program, film and cable TV contracts and various family services.²⁷

The families of prisoners should not be denied the benefits of BPP in order to protect inmate-phone commissions. These commissions represent a special tax imposed on the families and friends of prisoners. Even if all states used these revenues to fund worthwhile prison programs and services, the FCC should not encourage the tax. Since many families of prisoners are indigent, the imposition of this special tax on those least able to pay is particularly poor, if not perverse, public policy. If the FCC excludes the calls from correctional facilities from BPP on these grounds it will be condoning anti-competitive practices and inflated rates to achieve state purposes unrelated to telecommunications.

CONCLUSION

PULP urges that calls from inmates be included in the Commission order on BPP. In New York, families of inmates, many of which include indigent minors, are paying higher than

These estimates are based on a conversation with a staff member of the New York State Assembly Subcommittee on Corrections. Confirmation of these amounts has been requested but not yet received from the New York State Department of Corrections in a Freedom of Information Act request dated June 16, 1994.

^{27 &}lt;u>See</u> letter from the New York State Department of Corrections contained in Exhibit 3.

competitive rates for these telephone services. Consumeroriented competition in this market can be expected to bring down
rates, halt abuses and improve service quality. Exclusion of
inmate-only calls will not necessarily reduce fraud and many
other means are available to restrict usage. Alternatives to
collect-only phone systems are currently available. Worthwhile
prison programs should be funded from general tax revenues, not
from FCC-encourage uneconomic telephone commissions.

Respectfully submitted,

B. Robert Piller, Esq. Executive Director

By: Trudi J. Renwick, Ph.D.
Economic Policy Analyst
Public Utility Law Project of
New York, Inc.
Pieter Schuyler Financial Center
39 Columbia Street
Albany, New York 12207-2717
(518) 449-3375

Date: July 15, 1994

1

EXHIBIT 1

CORRESPONDENCE FROM PRISONERS' LEGAL SERVICES

PRISONERS' LEGAL SERVICES OF NEW YORK

PAUL J. CURRAN Chairman, Board of Directors

JAN 12 1994

105 Chambers Street 2nd Floor New York, N.Y. 10007-1076 (212) 513-7373 Fax: (212) 571-6874

DAVID C. LEVEN Executive Director

TOM TERRIZZI Associate Director

January 5, 1994

STEPHEN M. LATIMER Senior Litigation Attorney

RUTH N. CASSELL Director of Development

Robert B. Piller
Executive Director
Public Utility Law Project
of New York, Inc.
30 Columbia Street
Albany, NY 12307-2717

Dear Bob:

I am writing to follow-up on our communications concerning the Department of Correctional Services telephone system and charges. Although I have not received a great deal of information from clients or my colleagues in PLS concerning problems with the Telephone Home Program I have been told that the following are problems:

- Telephone calls are cut off during the first minute or two with the result being that additional calls need to be placed;
- 2. Family members and friends are apparently told that they have to pay an additional company for service other than the regular carrier for service for calls from the department;
- 3. Calls have been charged to family members and friends of inmates when the entire population is proportedly locked in after recreational hours;
- 4. The telephone rates on bulletin boards are reportedly not consistent with the rates charged to family members and friends;
- 5. Families are forced to deal with a telephone company and their rates without any input;
- 6. The security package that comes with the system has raised a question as to whether or not the rights of those not incarcerated are being violated;

- 7. It is reported that bills do not always come monthly;
- 8. Clients of Community Action Agencies, whose loved ones may be in prison, report that they have problems including;
 - a. receiving four to five calls daily
 - b. having difficulties saying no
 - c. having difficulties determining if the call is an emergency when that is all they would want to accept at times
 - d. having difficulty understanding the automated voice that asks families to accept calls and not giving families sufficient opportunity to reject a call
 - e. families not having the ability to pay phone bills, thereby losing phone services.

I am told that Community Action Agencies may have some additional information if you want to communicate with any of them. Patricia Purcell who specializes in the area of services to inmates for the Community Services Block Grant Program may have information. She can be reached at 474-5741. Also, Deborah Malone, Director of the Life Line Program for the telephone company (New York Telephone I think) may be helpful. She is in charge of the "Screening Service" which allows an individual to call their local telephone company and have those calls screened out before they can even come through the line. There is no charge for the installation of this service, I am told nor is there a monthly fee but not every long distance carrier participates in the program. Ms. Malone can be reached at (716)-842-7120.

I hope that this information is helpful.

Sincerely,

David C. Leven

Executive Director

DCL:mac

PRISONERS' LEGAL SERVICES OF NEW YORK

PAUL J. CURRAN Chairman, Board of Directors NPR2.81994

April 21, 1994

105 Chambers Street 2nd Floor New York, N.Y. 10007-1076 (212) 513-7373

Fax: (212) 571-6874

DAVID C. LEVEN Executive Director

TOM TERRIZZI Associate Director

STEPHEN M. LATIMER Senior Litigation Attorney

RUTH N. CASSELL Director of Development

Robert Piller, Esq. Executive Director Public Utilities Law Project of New York, Inc. 30 Columbia Street Albany, NY 12307-2717

Dear Bob:

I write to provide you with information sent to us by another client of PLS. I am informed that phone blocks are being placed on numbers for the slightest delay in paying a bill or for not paying a bill in its entirety and that these blocks last for six months. Our client has claimed that due to a phone bill being paid two days late he is not unable to phone his terminally ill mother.

I enclose a copy of the letter received from our client.

Sincerely,

David C. Leven Executive Director

DCL:mac

Meleny

S. MEKINS 84 A 3980 SHAWANGUNK (ROSON) Box 700 WALLELL, HEN YORK 12589 30 MARCH 1994 MR DAVID C. LEVEH EXECUTIVE DIRECTOR PRISOMERS' LEGAL SERVICE OF HEW GRK 105 CHAMBERS STREET HEN YORK, HEN YORK 10007 Bear Mr. Leven: I have been reterred to you by Mrs. Janice Turso from the PLZ branch in touch teepsie in regards to the autonated show system (VAC/Integra-tel Inc.) that the Separtment of Correctional Services has contracted. As I understand, you are in possession

of the better I forwarded to Ats. Torso. In addition to the overbillings, another problem has arisen. VAC and Interstated Inc. are now placing phone blocks (restrictions) on phone numbers; this is being done to the slightest delay in paying a bill or tor not paying a bill in its entirety. This is absolutely absurd when you consider the tack that, people are receiving enormors bills due to the overhillings. I have a Mother, Mrs. Matilda Sweeney,

I have a Mother, Mrs. Matilda Sweeney, who is diagnosed as having terminal cancer whom I can no longer call because of this phone book. I am in dire need of assistance. My Mother is in the sewish Hospital and Hone for the Aged, 100 Eingsbridge Food, Bronx Hew York 10468, (718)